# UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

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) Case No.: 2:65-cv-00396-MHH
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### JOINT PROPOSED SCHEDULING ORDER

On April 24, 2017, the Court issued a Memorandum Opinion and Order in this longstanding school desegregation case (Doc. 1141). In that Order, the Court instructed the Jefferson County Board of Education (the "District"), Plaintiffs Linda Stout, Alfornia and Lonnell Carter, Sandra Ray, and Ricky and Allene Reeves (collectively, "Private Plaintiffs"), and Plaintiff-Intervenor the United States (altogether, the "parties") to submit a proposed timeline for the discovery necessary for an evaluation of the District under each of the *Green* factors. In accordance with the Court's Order, the parties respectfully submit the following joint proposed schedule:

**Informal Request for Information**: Private Plaintiffs and the United States (the "Plaintiff Parties") shall send the District initial requests for information no later than <u>June 24</u>, <u>2017</u>.

**Site Visits**: During the fall of 2017, the Plaintiff Parties shall conduct site visits of the District and interview appropriate District personnel. The District agrees to coordinate with the Plaintiff Parties to schedule follow-up site visits, as requested.

**Factual Discovery**: The parties shall complete fact discovery no later than October 31, 2017.

**Expert Discovery**: Expert witnesses, if necessary, shall be retained by November 1, 2017. The parties shall complete expert discovery no later than February 1, 2018.

**Meeting of the Parties**: The parties shall meet as soon as practical to attempt to negotiate a joint proposed consent order addressing each of the *Green* factors. The parties shall provide the Court with status updates via teleconference in mid-November 2017 and mid-February 2018.

**Joint Proposed Consent Order**: Although the parties may conclude negotiation of consent order terms pertaining to individual *Green* factors on a rolling basis, and the District may begin planning and preparation in accordance therewith, negotiation of a comprehensive joint proposed consent order shall be completed no later than May 31, 2018.

Respectfully submitted on this 24th day of May, 2017.

For Plaintiff-Intervenor United States of America:

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